Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

DEVAL L. PATRICK
Governor

RICHARD K. SULLIVAN JR.
Secretary

DAVID W. CASH
Commissioner

June 6, 2014

Michael Moats
Styrolution America LLC
950 Worcester Street
Indian Orchard, Massachusetts 01151

RE: Indian Orchard
Transmittal No.: X257195
Application No.: WE-13-028
Class: NM25
FMF No.: 50156
AIR QUALITY PLAN APPROVAL

Dear Mr. Moats:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Waste Prevention, has reviewed your Limited Plan Application ("Application") listed above. This Application concerns the proposed modification of existing Plan Approval #WE-12-015 to allow for the combustion of natural gas, without being combined with any other fuel, in the existing International Boiler Works, Model TH-14 fire tube boiler at your facility located at 950 Worcester Street in Indian Orchard, Massachusetts ("Facility"). The facility is requesting this change since Plan Approval #WE-12-015 currently states that natural gas shall only be fired in combination with a monomer fuel.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control," regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

The conditions contained in this plan approval only apply during the combustion of natural gas, without being combined with any other fuel, in the existing supplemental 10 million Btu per hour COEN Model CPF-10 burner contained in the International Boiler Works, Model TH-14 fire tube boiler.

This Plan Approval will supersede Condition #4 of Table 6 -Special Terms and Conditions contained in Plan Approval #WE-12-015, issued December 19, 2012. All other conditions contained in Plan Approval #WE-12-015, issued December 19, 2012, remain in effect.

1. DESCRIPTION OF FACILITY AND APPLICATION

Styrolution America LLC submitted plan approval application #WE-13-028 for the combustion of natural gas, without being combined with any other fuel, in the existing International Boiler Works, Model TH-14 fire tube boiler. This fuel change is a modification to Plan Approval # WE-12-015, originally issued December 17, 2012 and administratively amended December 19, 2012. Plan Approval # WE-12-015 currently allows the existing International Boiler Works, Model TH-14 fire tube boiler to combust a purge monomer (styrene or styrene and methyl methacrylate (MMA)) at a maximum heat input rate of 12.23 million Btu per hour either alone or in combination with natural gas. Plan Approval #WE-12-015 currently states that natural gas shall only be fired in combination with the monomer fuel. Due to the operational needs of the facility, plan approval application #WE-13-028 is requesting approval for the use of natural gas in the boiler's supplemental 10 million Btu per hour COEN Model CPF-10 burner without being combined with the purge monomer fuel.

Styrolution America LLC conducts a polystyrene manufacturing process. This manufacturing process uses a styrene monomer and sometimes a styrene and MMA monomer in the commercial polymerization of polystyrene. The styrene and MMA monomer contain small quantities of polymer, inhibitor, ethylbenzene and trace organic contaminants. In addition, dimmers, trimers and other low molecular weight styrene oligimers are produced during the polymerization process. All of the abovementioned materials are non-reactive in the polymerization process and eventually increase in composition to the point that the required polystyrene specification cannot be produced. To eliminate the non-polymerizeable materials, the process is designed to "purge" a by-product stream where these materials are concentrated. This purge monomer, or styrene and MMA monomer stream, is then used as an alternate fuel in place of fuel oil or natural gas. The purge monomer is combusted in the International Boiler Works, Model TH-14 fire tube boiler to heat a mineral oil heat transfer fluid that is used to heat the polystyrene process equipment. Natural gas is also combusted in a separate burner to supplement the purge monomer fuel as needed to meet the process heat loads.

The existing International Boiler Works, Model TH-14 fire tube boiler is equipped with two fuel combustion burners. The purge monomer-fired burner has a maximum heat input rate of 12.23 million Btu per hour. The supplemental natural gas-fired burner is a COEN Model CPF-10 with a maximum heat input rate of 10 million Btu per hour. The existing natural gas-fired burner was constructed in the boiler on July 27, 1994 and the spuds were replaced on August 9, 2002. The spuds are high temperature metal nozzles drilled with holes that are used to admit the gas into the passing air stream and establish good mixing of the gas and combustion air at the burner front.

The boiler is equipped with instrumentation to continuously monitor the natural gas flow rate. The natural gas flow rate is recorded by a data logger on an hourly basis.

Best Available Control Technology Analysis

The natural gas-fired 10 million Btu per hour burner in the International Boiler Works, Model TH-14 fire tube boiler must satisfy the best available control technology (BACT) requirements of 310 CMR 7.02(8)(a)2.

Since manufacturer emission data was not available for the 1994 vintage natural gas-fired burner, the facility conducted stack testing on the boiler. The stack testing was conducted on March 18, 2014, to determine the emission rates for nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compounds (VOC) and particulate matter (PM) while firing only natural gas in the boiler's 10 million Btu per hour COEN Model CPF-10 burner.

The stack tested NOx emission rate of 0.1514 pound per million Btu of heat input (average emission rate for the three test runs) exceeded the MassDEP Top Case Best Available Control Technology (BACT) Guidelines of 0.0350 pound per million Btu of heat input. Therefore, a top-down BACT analysis was conducted for NOx.

The top-down BACT analysis evaluated two types of NOx controls and a natural gas fuel usage restriction as discussed in the following paragraphs.

The first control evaluated was a selective catalytic reduction (SCR) system. This post combustion control device consisted of an ammonia injection system and a catalytic reactor. The control device used ammonia to react with NOx and oxygen in the presence of a catalyst to form molecular nitrogen and water. Since the monomer fuel burner and the natural gas burner will operate in the same combustion chamber and exhaust through the same stack, the SCR system was found to be technically infeasible due to the zinc contained in the monomer fuel that is deposited on the walls of the combustion chamber and the exhaust stack. These deposits can be released over time and may enter the exhaust stream during periods of natural gas combustion. It is possible to have a separate stack for natural gas combustion with a SCR system but this does not eliminate the zinc, deposited in the combustion chamber, from being released and poisoning the catalyst over time. Therefore, the SCR system was determined to be technically infeasible for this application.

The second control evaluated was a low NOx burner (LNB) in conjunction with flue gas recirculation (FGR) which would be retrofitted to the existing boiler. The LNB/FGR was determined to be technically feasible and could achieve a NOx removal efficiency of 76.9%. The removal efficiency was based on the vendor's guarantee that the retrofit of the LNB/FGR would meet the MassDEP Top Case BACT NOx emission rate of 0.0350 pounds per million Btu of heat input.

Since the LNB/FGR was determined to be technical feasible, an economic cost analysis was conducted. The cost analysis contained a pre-control annual NOx emission rate of 1.53 tons which was based on the stack tested emission rate of 0.1514 pound per million Btu of heat input and a voluntary natural gas fuel usage restriction of 19,850,000 cubic feet per year. The pre-control annual NOx emission rate was also equivalent to the annual emission rate determined by using the MassDEP Top Case BACT NOx emission rate of 0.0350 pounds per million Btu of heat, a maximum heat input of 10 million Btu per hour and 8760 hours per year of operation. Using the pre-control annual NOx emission rate with the vendor's removal efficiency of 76.9%, the controlled annual NOx emission rate was 0.35 tons for a removal of 1.18 tons per year of NOx. The vendor, BMR Thermal, Inc. provided equipment cost information which was used in conjunction with the removal efficiency to result in an annualized cost of $55,523 per ton of NOx removed. Therefore, the facility determined that the LNB/FGR was cost prohibitive. MassDEP agrees with this determination.

Since none of the NOx controls are technically or economically feasible, the facility has proposed a natural gas fuel usage limitation of 19,850,000 cubic feet in any 12 consecutive month period. The fuel usage limitation will result in an annual NOx emission rate limit of 1.53 tons per year. This annual NOx emission rate is equivalent to the annual NOx emission rate determined from the top case BACT NOx emission rate of 0.0350 lb/MMBtu, a maximum heat input of 10 million Btu per hour and 8760 hours per year of operation. In addition to the annual NOx emission limit and fuel usage restriction, the short-term NOx emission rate limits are 0.1514 pounds per million Btu of heat input (based on stack test data) and 1.51 pounds per hour (based on a maximum heat input of 10 million Btu per hour). The NOx emission limits and fuel usage limitation will apply only when natural gas is being combusted without being combined with any other fuel, such as purge monomer. MassDEP agrees that the proposed NOx emission rate limitations and the fuel usage restriction are representative of BACT in this case.

The stack test results also indicated that the pound per million Btu of heat input emission rates for CO, VOC and PM would be more than capable of meeting the MassDEP Top Case BACT Guidelines (June 2011) for boilers combusting natural gas in the size range of 10 million Btu per hour to less than 40 million Btu per hour. Therefore, the stack test data for CO, VOC and PM was used to establish BACT.

The CO, VOC and PM emission rates contained in Table 1 below have been proposed as BACT. The pound per million Btu of heat input emission rates are based on stack test data using the highest test run for each air contaminant. The pound per hour emission rates account for a maximum heat input of 10 million Btu per hour and the annual emission rates are further restricted by the natural gas fuel usage limitation of 19,850,000 cubic feet in any 12 consecutive month period. The CO, VOC and PM emission limits and fuel usage limitation will apply only when natural gas is being combusted without being combined with any other fuel, such as purge monomer. MassDEP agrees that the Table 1 emission rate limitations and fuel usage restriction are representative of BACT in this case.

Table 1.

Air Contaminant	lb/MMBtu	lb/hr	Tons in any 12 consecutive month period
CO	0.0014	0.014	0.01
VOC	0.0007	0.007	0.01
PM	0.0051	0.051	0.05

Regulatory Applicability

In addition to being subject to the BACT requirements of 310 CMR 7.02(8)(a)2, the firing of natural gas in the boiler is subject to the visible emission requirements of 310 CMR 7.06, the dust, odor, construction and demolition requirements of 310 CMR 7.09 and the noise reduction requirements of 310 CMR 7.10.

The boiler is also subject to 310 CMR 7.04(4)(a) which requires that the boiler be inspected and maintained in accordance with the manufacturers recommendations and tested for efficient operation at least once in each calendar year. The results of said inspection, maintenance, and testing and the date upon which it was performed shall be recorded and posted conspicuously on or near the boiler.

2. EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (EU) identified in Table 1 is subject to and regulated by this Plan Approval:

Table 1

EU#	Description	Design Capacity	Pollution Control Device (PCD)
1	International Boiler Works, Model TH-14 fire tube boiler	12.23 MMBtu/hr (firing styrene/MMA monomer) 10 MMBtu/hr (firing natural gas)	None

Table 1 Key:
EU# = Emission Unit Number
PCD = Pollution Control Device

3. APPLICABLE REQUIREMENTS

A. OPERATIONAL, PRODUCTION and EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2 below:

Table 2

EU#	Operational / Production Limit	Air Contaminant	Emission Limit[1] Natural Gas Fuel only
1	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the boiler shall use no more than 19,850,000 ft^3 of natural gas in any 12 consecutive month period. This fuel usage restriction only applies during periods when natural gas is not being combusted in combination with any other fuel.	NOx	≤0.1514 lb/MMBtu
			≤ 1.51 lb/hr
			≤ 1.53 tons in any 12 consecutive month period
		PM/PM10/PM 2.5	≤0.0051 lb/MMBtu
			≤ 0.051 lb/hr
			≤ 0.05 tons in any 12 consecutive month period
		CO	≤0.0014 lb/MMBtu
			≤ 0.014 lb/hr
			≤ 0.01 tons in any 12 consecutive month period
		VOC/Total HAP	≤0.0007 lb/MMBtu
			≤ 0.007 lb/hr
			≤ 0.01 tons in any 12 consecutive month period
	Smoke	Pursuant to 310 CMR 7.06(1)(a), shall not exceed No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	
	Opacity	≤ 10% at any time	

Table 2 Notes:

1. **The NOx, PM, CO, VOC and Total HAP emission rate limitations apply only during the combustion of natural gas from the boiler's 10 million Btu per hour burner.**

Table 2 Key:

EU# = Emission Unit Number
NO_x = Nitrogen Oxides
CO = Carbon Monoxide
VOC = Volatile Organic Compounds
HAP = Hazardous Air Pollutant
PM = Total Particulate Matter (including condensables)
PM_{10} = Particulate Matter less than or equal to 10 microns in diameter (including condensables)
$PM_{2.5}$ = Particulate Matter less than or equal to 2.5 microns in diameter (including condensables)
$\leq$ = Less than or equal to
lb/hr = pounds per hour
lb/MMBtu = pounds per million British thermal units

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3

EU#	Monitoring and Testing Requirements
1	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a), the boiler shall be equipped with instrumentation which is capable of continuously monitoring the amount of natural gas combusted in the 10 million Btu per hour COEN Model CPF-10 burner.
	2. If applicable, the Permittee shall submit emission test protocol(s) for review and written MassDEP approval at least 30 days prior to a proposed test date. The test protocol(s) must describe the test methods and procedures to be used in the performance of testing, shall include dimensioned sketches of the exhaust systems showing the locations of all proposed sampling ports, shall identify all process data, including fuel feed rate and boiler heat input rate, which will be monitored and recorded during testing.
	3. All emissions testing shall be conducted in accordance with the MassDEP's "Air Contaminant Emission Test Guidelines" and in accordance with the Environmental Protection Agency tests as specified in the 40 CFR Part 60, Appendix A, or by a methodology approved by MassDEP.
	4. In accordance with 310 CMR 7.04(4)(a), no person shall cause, suffer, allow, or permit the operation of any fossil fuel utilization facility rated by the Department as having an energy input capacity equal to or greater than 3,000,000 Btu per hour unless said facility has been inspected and maintained in accordance with the manufacturers recommendations and tested for efficient operation at least once in each calendar year.
Facility-wide	5. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13

Table 3 Key:
EU# = Emission Unit Number
lb/MMBtu = pounds per million British thermal units
CFR = Code of Federal Regulations
Btu = British thermal units
USEPA = The United States Environmental Protection Agency

Table 4	
EU#	**Recordkeeping Requirements**
1	1. The Permittee shall maintain comprehensive and accurate records of the amount of natural gas used in the boiler's 10 million Btu per hour COEN Model CPF-10 burner which is not combusted in combination with any other fuel during each month and each 12 consecutive month period. The natural gas fuel rate shall be recorded at a minimum frequency of once per hour.
	2. In accordance with 310 CMR 7.04(4)(a), the Permittee shall maintain records of the results of the inspection, maintenance, and annual testing required by this Regulation and shall post these results conspicuously on or near the boiler.
Facility-wide	3. The Permittee shall maintain adequate records onsite to demonstrate compliance status with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report
	4. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	5. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU(s) approved herein on-site.
	6. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	7. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	8. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	9. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

Table 4 Key:
EU# = Emission Unit Number
SOMP = Standard Operating and Maintenance Procedure
USEPA = United States Environmental Protection Agency

Table 5	
EU#	**Reporting Requirements**
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Western Regional Office of MassDEP, BWP Permit Chief by telephone [413-755-2115], email [marc.simpson@state.ma.us] or fax [413-784-1149], as soon as possible, but no later than one (1) business day after discovery of an exceedance(s) of Table 2 requirements or continuous emission monitoring equipment failure. A written report shall be submitted to BWP Permit Chief at MassDEP within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s) or continuous emission monitoring equipment failure, corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's written request.
	4. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements.
	5. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 3 Monitoring and Testing Requirements. This test report shall contain the results of the testing, a description of the test methods and procedures actually used in the performance of the tests, copies of all process data collected during the testing, copies of all raw test data and copies of all calculations generated during data analysis. The results of the testing shall be expressed in units which allow for a direct comparison, and determination of compliance, with the air contaminant emission limitations contained herein.

Table 5 Key:
EU# = Emission Unit Number
BWP = Bureau of Waste Prevention

4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below"

Table 6	
EU#	**Special Terms and Conditions**
1	1. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., the boiler shall be equipped with a natural gas-fired 10 million Btu per hour Coen Model: CPF-10 burner.
	2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2., only styrene monomer, styrene and methyl methacrylate monomer and natural gas shall be fired in the boiler at any time.
	3. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.

Table 6 Key:
EU# = Emission Unit Number

B. The Permittee shall install and use an exhaust stack, as required in Table 7, on each of the Emission Units that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Each exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as "shanty caps" and "egg beaters." The Permittee shall install and utilize exhaust stacks with the following parameters, as contained in Table 7 below, for the Emission Units that are regulated by this Plan Approval:

Table 7				
EU#	**Stack Height Above Ground (feet)**	**Stack Inside Exit Dimensions (feet)**	**Stack Gas Exit Velocity Range (feet per second)**	**Stack Gas Exit Temperature Range (^{o}F)**
1	80	2	19.9	400

Table 7 Key:
EU# = Emission Unit Number
^{o}F = Degree Fahrenheit

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).

B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.

C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.

D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.

E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.

F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.

G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.

H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.

I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.

J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars ($100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Cortney Danneker by telephone at 413-755-2234, or in writing at the letterhead address.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

_____

Marc Simpson
Air Quality Permit Chief
Bureau of Waste Prevention
Western Region

cc: WERO AQ plan file
WERO AQ approval file

ecc: Yi Tian – MassDEP Boston
Peter Czapienski – MassDEP WERO